

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

TOP OF THE HILL, LLC

PLAINTIFF

VERSUS

CAUSE NO.:1:19-cv-392-HSO-JCG

PEARL RIVER COUNTY, MISSISSIPPI

DEFENDANT

UNOPPOSED MOTION FOR EXTENSION OF DEADLINES

COMES NOW the Plaintiff, Top of the Hill, LLC (“TOTH”), by and through its attorneys of record, and files this, its *Unopposed Motion for Extension of Deadlines* and in support thereof would show unto the Court as follows:

1. On September 13, 2019, the Court entered its Case Management Order [Doc. 11] setting forth the following deadlines for the parties to designate experts:

Plaintiff: November 13, 2019

Defendant: December 13, 2019

2. Further, the Case Management Order set the deadlines for discovery and dispositive/Daubert motions:

Discovery: March 13, 2020

Motions: March 27, 2020.

2. Plaintiff requests a two (2) month extension to designate its experts until January 13, 2020 and by the same extension, allowing Defendant until February 13, 2020 to designate its experts.
3. Because of the requested extension for experts, Plaintiff requests that the discovery and motion deadlines also be extended two (2) months setting the deadline for discovery to be

completed on May 13, 2020 and the deadline for filing motions for May 27, 2020.

4. Prior to filing the instant motion, Plaintiff's counsel conferred in good faith with counsel for Defendant and Defendant's counsel represented that she would not oppose the instant motion.
5. The requested extension will not prejudice any Party. This matter is not set for trial until April 5, 2021.
6. Due to the simple nature of this Motion, Plaintiff requests that it be relieved of the requirement to file a memorandum in support as required by L.U.Civ.R. 7(b)(4).

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that its *Unopposed Motion for Extension of Deadlines* be granted and that the Case Management Order deadlines be extended to the following dates:

- (1) Plaintiff's Expert Designation: January 13, 2020;
- (2) Defendant's Expert Designation: February 13, 2020;
- (3) Discovery Deadline: May 13, 2020; and
- (4) Dispositive/*Daubert* Motion Deadline: May 27, 2020.

Respectfully submitted this the 16th day of October, 2019.

**TOP OF THE HILL, LLC,
Plaintiff**

/s/ *Samuel S. McHard*
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all counsel of record in accordance with the Federal Rules of Civil Procedure.

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This the 16th day of October, 2019.

/s/ Samuel S. McHard
COUNSEL OF RECORD